

U.S. Department of Justice

Washington, DC 20530

Supplemental Statement**Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 10/31/2022
(Insert date)**I - REGISTRANT**

1. (a) Name of Registrant

Rosemont Associates, LLC

(b) Registration Number

6161

(c) Primary Business Address

3140 S. Ocean Blvd., Apt. 205N, Palm Beach, FL 33480

2. Has there been a change in the information previously furnished in connection with the following?

(a) If an individual:

(1) Residence address(es) Yes ☐ No ☐(2) Citizenship Yes ☐ No ☐(3) Occupation Yes ☐ No ☐

(b) If an organization:

(1) Name Yes ☐ No ☒(2) Ownership or control Yes ☐ No ☒(3) Branch offices Yes ☐ No ☒

(c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.3. If the registrant previously filed an Exhibit C¹, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

¹ The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

| Name | Residence Address | Citizenship | Position | Date Assumed |
|------|-------------------|-------------|----------|--------------|
|------|-------------------|-------------|----------|--------------|

(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

| Name | Position | Date Ceased |
|------|----------|-------------|
|------|----------|-------------|

5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

| Name | Foreign Principal(s) Represented | Services |
|------|----------------------------------|----------|
|------|----------------------------------|----------|

(b) During this 6 month reporting period, did any employee or individual working in any other capacity begin rendering services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☐ No ☒

| Name | Foreign Principal | Residence Address | Citizenship | Position | Date Assumed |
|------|-------------------|-------------------|-------------|----------|--------------|
|------|-------------------|-------------------|-------------|----------|--------------|

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

| Name | Position or Connection | Date Terminated |
|------|------------------------|-----------------|
|------|------------------------|-----------------|

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☐ No ☒

If yes, furnish the following information:

| Name | Position or Connection | Foreign Principal | Date Terminated |
|------|------------------------|-------------------|-----------------|
|------|------------------------|-------------------|-----------------|

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

II - FOREIGN PRINCIPAL

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date of Termination

8. Has the registrant added any new foreign principal(s)² during this 6 month reporting period?

Yes ☐No ☒

If yes, furnish the following information:

Foreign Principal

Date Added

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

National Council of Resistance of Iran

10. (a) Have the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A³Yes ☐No ☐N/A ☒Exhibit B⁴Yes ☐No ☐N/A ☒

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and/or B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period?

Yes ☐No ☒

If yes, has the registrant filed an amendment to these exhibits?

Yes ☐No ☐

If no, please file the required amendment.

² The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

³ The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

⁴ The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

III - ACTIVITIES

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

| Foreign Principal | Activities/Services |
|---------------------------|---------------------|
| See Appendix for Response | |

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity⁵ as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

See Appendix for Response

Set forth below in the required detail the registrant's political activities.

| Foreign Principal | Date | Contact | Method | Purpose |
|---------------------------|------|---------|--------|---------|
| See Appendix for Response | | | | |

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

| Foreign Principal | Activities/Services |
|-------------------|---------------------|
| | |

⁵ "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

14. (a) **RECEIPTS-MONIES**

If no, please explain why no monies were received.

| | |
|-------|-----------|
| \$ | 60,000.00 |
| <hr/> | |
| Total | |

If no, please file the required Exhibit D.

| Foreign Principal | Date Received | From Whom | Purpose | Thing of Value |
|--|---------------|-------------------------------|--|---|
| National Council of Resistance of Iran | 10/14/2022 | Alliance for Public Awareness | Payment on behalf of registrant to DLA Piper LLP (US) for legal fees | Payment on behalf of registrant to DLA Piper LLP (US) for legal fees (\$11,113) |

9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

15. (a) DISBURSEMENTS-MONIES

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

| Foreign Principal | Date | Recipient | Purpose | Amount | Subtotal |
|--|-----------------------|--------------------|---|-----------|-----------|
| National Council of Resistance of Iran | 05/15/2022-10/15/2022 | AT&T | Cell phone expenses | \$ 59.86 | |
| National Council of Resistance of Iran | 05/17/2022 | DLA Piper LLP (US) | Reimbursement of FARA filing fee | \$ 305.00 | |
| National Council of Resistance of Iran | 09/20/2022-09/21/2022 | Amtrak | Train tickets to/from NCRI UN rally in New York City for Senator Torricelli | \$ 89.10 | |
| National Council of Resistance of Iran | ----- | ----- | ----- | -----> | \$ 453.96 |

\$ 453.96
Total

(b) DISBURSEMENTS-THINGS OF VALUE

During this 6 month reporting period, has the registrant disposed of anything of value¹⁰ other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

| Foreign Principal | Date | Recipient | Purpose | Thing of Value |
|--|------|-----------|---------|----------------|
| National Council of Resistance of Iran | | | | None |

(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value¹¹ in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

| Date | Donor | Political Organization/Candidate | Method | Amount/Thing of Value |
|------------|-------------------|---|-------------|-----------------------|
| 05/12/2022 | Robert Torricelli | Donald Norcross for Congress | Check | \$ 900.00 |
| 05/19/2022 | Robert Torricelli | Shapiro for PA | Check | \$ 2,500.00 |
| 06/01/2022 | Robert Torricelli | DiMarco & DiCarlo for Commissioner | Check | \$ 400.00 |
| 06/06/2022 | Robert Torricelli | Tom Malinowski for Congress | Credit card | \$ 1,000.00 |
| 06/10/2022 | Robert Torricelli | Liz Holtzman for Congress | Credit card | \$ 1,000.00 |
| 06/24/2022 | Robert Torricelli | Marcy Kaptur's Grassroots Campaign for Congress | Credit card | \$ 2,900.00 |
| 08/25/2022 | Robert Torricelli | DiMarco & DiCarlo for Commissioner | Check | \$ 1,000.00 |
| 09/09/2022 | Robert Torricelli | Reed Gusciora for Mayor of Trenton | Check | \$ 1,000.00 |
| 09/09/2022 | Robert Torricelli | Pallone for Congress | Check | \$ 1,000.00 |
| 09/27/2022 | Robert Torricelli | Reed Gusciora for Mayor of Trenton | Check | \$ 1,000.00 |

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?¹² Yes ☒ No ☐

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

National Council of Resistance of Iran

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

| Foreign Principal | Period of Time | Amount |
|-------------------|----------------|--------|
|-------------------|----------------|--------|

Total

18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

| | | | |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper | <input type="checkbox"/> Advertising campaigns | <input type="checkbox"/> Press releases | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams |

☒ Email

☐ Website URL(s): _____

☐ Social media websites URL(s): _____

☐ Other (specify) _____

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

| | | |
|--|---|---|
| <input checked="" type="checkbox"/> Public officials | <input type="checkbox"/> Newspapers | <input type="checkbox"/> Libraries |
| <input type="checkbox"/> Legislators | <input type="checkbox"/> Editors | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups |
| <input type="checkbox"/> Other (specify) _____ | | |

20. Indicate the language used in the informational materials:

☒ English ☐ Other (specify) _____

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☐ No ☒

If no, please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☐ No ☒

12 The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

VI - EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

| Date | Printed Name | Signature ¹³ |
|-----------------------------|---|---|
| <u>11/28/2022</u> | <u>Robert G. Torricelli</u> | <u>/s/Robert G. Torricelli</u> |
| <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> |
| <u> </u> | <u> </u> | <u> </u> |

¹³ This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

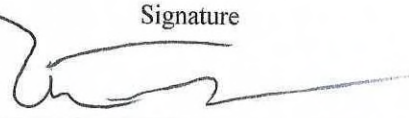
EXECUTION

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

11/25/2022Robert G. Torricelli

Appendix

Response to Item 11

Item 11: During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? If yes, identify each foreign principal and describe in full detail all activities and services:

| Foreign Principal(s) | Activities/Services |
|--|---|
| National Council of Resistance of Iran | The registrant provided information to U.S. officials on behalf of the foreign principal regarding economic and political conditions in Iran and the effects of U.S. policy regarding Iran. The registrant also provided advice and engaged in advocacy regarding the resettlement of Iranian refugees in Albania. In addition, the registrant participated in a video call on behalf of the foreign principal to act as a witness in a court action surrounding the prosecution of Iranian officials that attempted a terrorist attack on an Iranian event held in Paris. The registrant also attended and provided remarks at two (2) in-person events hosted by the foreign principal: (1) a press conference held in Brussels, Belgium on September 16, 2022 concerning a different Belgian court that convicted Iranian terrorists; and (2) a United Nations rally held in New York City, New York on September 21, 2022 to protest the president of Iran. |

Appendix

Response to Item 12-Description

National Council of Resistance of Iran: The registrant provided information to U.S. officials on behalf of the foreign principal regarding economic and political conditions in Iran and the effects of U.S. policy regarding Iran. The registrant also provided advice and engaged in advocacy regarding the resettlement of Iranian refugees in Albania. In the course of providing these services to the foreign principal, the registrant communicated with U.S. executive branch officials as detailed in the log below. The registrant also attended and provided remarks at two (2) in-person events hosted by the foreign principal: (1) a press conference held in Brussels, Belgium on September 16, 2022 concerning a different Belgian court that convicted Iranian terrorists, and (2) a United Nations rally held in New York City, New York on September 21, 2022 to protest the president of Iran. These events were open to the media.

Appendix

Response to Item 12-Detail

| Foreign Principal(s) | Date | Contact | Method | Purpose |
|--|------------|--|-----------------------|--|
| National Council of Resistance of Iran | 07/21/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania; Tobei Arai, Foreign Service Officer, Department of State | E-mail | Request for call re: potential security threat to the Free Iran World Summit |
| National Council of Resistance of Iran | 07/22/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mails and telephone | Discussion re: postponement/cancellation of Free Iran World Summit |
| National Council of Resistance of Iran | 08/01/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania; Tobei Arai, Foreign Service Officer, Department of State | E-mail | Transmission of news article related to potential attack on Camp Ashraf |
| National Council of Resistance of Iran | 08/02/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania; Tobei Arai, Foreign Service Officer, Department of State | E-mails | Discussion re: concerns about potential attack on Camp Ashraf |
| National Council of Resistance of Iran | 08/21/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mails | Discussion re: concerns about potential attack on Camp Ashraf |
| National Council of Resistance of Iran | 09/08/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mail | Request for meeting in Albania to discuss Camp Ashraf/Albania issues |
| National Council of Resistance of Iran | 09/09/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mail | Meeting scheduling |
| National Council of Resistance of Iran | 09/09/2022 | Kirby Campbell-Rierson, Foreign Service Office Management Specialist; Ravi Sunil, Political-Economic Affairs Officer; Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mails | Meeting scheduling |

| Foreign Principal(s) | Date | Contact | Method | Purpose |
|--|------------|---|---------|---|
| National Council of Resistance of Iran | 09/17/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mails | Discussion re: security concerns at Camp Ashraf |
| National Council of Resistance of Iran | 10/13/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mail | Update re: Iran/Albania issues and request for telephone call to discuss outreach to Albanian officials |
| National Council of Resistance of Iran | 10/18/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mail | Follow-up regarding request for telephone call |
| National Council of Resistance of Iran | 10/27/2022 | Demian Smith, Deputy Chief of Mission, U.S. Embassy in Albania | E-mail | Request for telephone call |

Appendix

Response to Item 14(a)-Detail

| Foreign Principal(s) | Date Received | From Whom | Purpose | Amount | Subtotal |
|--|---------------|---|----------------|-------------|-------------|
| National Council of Resistance of Iran | 05/23/2022 | Wise Inc. (on behalf of the National Council of Resistance of Iran) | Consulting fee | \$10,000.00 | |
| National Council of Resistance of Iran | 06/22/2022 | Wise Inc. (on behalf of the National Council of Resistance of Iran) | Consulting fee | \$10,000.00 | |
| National Council of Resistance of Iran | 07/27/2022 | Wise Inc. (on behalf of the National Council of Resistance of Iran) | Consulting fee | \$ 9,450.00 | |
| National Council of Resistance of Iran | 08/19/2022 | Wise Inc. (on behalf of the National Council of Resistance of Iran) | Consulting fee | \$10,550.00 | |
| National Council of Resistance of Iran | 09/14/2022 | Wise Inc. (on behalf of the National Council of Resistance of Iran) | Consulting fee | \$ 8,350.00 | |
| National Council of Resistance of Iran | 10/12/2022 | Wise Inc. (on behalf of the National Council of Resistance of Iran) | Consulting fee | \$11,650.00 | |
| National Council of Resistance of Iran | ----- | ----- | ----- | -----> | \$60,000.00 |